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In Re:

**WILLIAM MCDADE
GINA MCDADE,**

Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No. 16-26331RG

Chapter 13

**OBJECTION TO APPLICATION FOR EARLY
TERMINATION OF LOSS MITIGATION**

1. I, Scott D. Sherman, am an attorney at law in the State of New Jersey and I am the attorney for the Debtor in the above case. I am filing this certification in support of Debtors' Early Termination of Loss Mitigation
2. These Debtors filed his bankruptcy case on August 25, 2016.
3. On 1/10/2018 a Loss Mitigation Order was entered which gave a Loss Mitigation deadline of 3/31/2018.
4. I spoke with Mr. McDade yesterday and he advised that he had been out of work since the start of December, 2017 which was the cause for his delay in providing our office with the necessary information to submit to the DMM portal.
5. Mr. McDade further advised that he found a new job and is starting on February 12, 2018. He also advised that he will be working on getting our office all of the information and documents necessary to allow us to submit a complete loan modification package through the portal.
6. We are requesting that the request for early termination be denied to allow

Debtors the opportunity to get a Loan Modification Application submitted.

WHEREFORE, it is respectfully requested that this HONORABLE COURT to Deny the Application for Early Termination of Loss Mitigation.

I hereby certify that the foregoing statements are true. I further certify that if any of the statements made by me are willfully false I am subject to punishment.

Dated:2/3/2018

MINION & SHERMAN

/S/ Scott D. Sherman, ESQ.

SCOTT D. SHERMAN, ESQ.
Attorney for the Debtor(s)